The Honorable John H. Chun 1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 P. POE 5, and P. POEs 2 through 4 and 6 through 75, individually and on behalf of others similarly 9 situated. 10 Plaintiffs. No. 2:24-cy-00170-JHC 11 STIPULATION AND [PROPOSED] VS. ORDER TO POSTPONE CERTAIN 12 THE UNIVERSITY OF WASHINGTON, a DISCOVERY DATES AND SET Washington public corporation; PERRY TAPPER, DEADLINES FOR PRELIMINARY 13 Director of Public Records and Open Public INJUNCTION BRIEFING Meetings at the University of Washington, in their 14 official capacity, **15** NOTE ON MOTION CALENDAR: Defendants. FEBRUARY 18, 2025 16 and **17** PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC., a Virginia nonstock 18 corporation, and NORTHWEST ANIMAL RIGHTS NETWORK, a Washington nonprofit corporation, 19 Intervenor-Defendants. 20 21 **STIPULATION** 22 Plaintiffs, Defendants, and Intervenor-Defendants, by and through their respective 23 counsel, have conferred and stipulate and agree as follows: 24 1. At this time, the parties do not anticipate further issues involving discovery or 25 disclosures that would require the Court's attention until after the Court issues a decision on **26** Plaintiffs' forthcoming Motion for Preliminary Injunction. Accordingly, for efficiency, and because counsel for the University and Mr. Tapper filed a Notice of Unavailability covering

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1	some of the relevant dates, the parties agree and jointly request that the deadlines for the FRCP			
2	26(f) conference, initial disclosures, and Combined Joint Status Report and Discovery Plan set			
3	forth in the Court's Order of February 10, 2025 (Dkt #67) should be postponed until after the			
4	Court's ruling on the Motion for Preliminary Injunction. The parties will then jointly agree on			
5	new dates for these events.			
6	2. Plaintiffs will file their Motion for Preliminary Injunction no later than February			
7	24, 2025, and note it for consideration on March 24, 2025. Defendant's and Interventor			
8	Defendant's response will be due March 17, 2025. Any reply will be due March 24, 2025.			
9				
10	<b>DATED</b> this 18 <sup>th</sup> day of February 20	25.		
11	NICHOLAS W. BROWN Washington Attorney General	GOLDFARB & HUCK ROTH RIOJAS, PLLC		
12	The state of the			
13	/s/ Jessica L. Creighton	/s/ Darwin P. Roberts		
	Jessica L. Creighton, WSBA #37956 Assistant Attorney General	Darwin P. Roberts, WSBA #32539		
14	·	925 Fourth Avenue, Suite 3950		
15	Washington Attorney General's Office University of Washington Division	Seattle, WA 98104 Telephone: (206) 452-0260		
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17	Seattle, Washington 98195-9475	A C. DI : .:CC		
10	Phone: (206) 543-4150 E-mail: jessica.creighton@atg.wa.gov	Attorneys for Plaintiffs		
18	E man. jessica.ereighton@atg.wa.gov	ANGELI & CALFO LLC		
19	Attorneys for Defendants University of Washington and Perry Tapper			
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21		Peter D. Hawkes, WSBA #56794		
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24				
25		Attorneys for Intervenor-Defendants		
26		People for the Ethical Treatment of Animals, Inc. and Northwest Animal Rights Network		

STIPULATION AND [PROPOSED] ORDER TO POSTPONE CERTAIN DISCOVERY DATES & SET DEADLINES FOR BRIEFING - 2

1	<u>ORDER</u>				
2	It is hereby ORDERED that:				
3	1. The deadlines in the Court's February 10, 2025 Order are postponed until the				
4	resolution of Plaintiffs' forthcoming Motion for Preliminary Injunction;				
5	2. Plaintiffs shall file their Motion for Preliminary Injunction no later than February				
6	24, 2025, and note it for consideration on March 24, 2025. Defendants' and Interventor				
7	Defendants' responses are due March 17, 2025. Any reply is due March 24, 2025.				
8					
9	<b>DATED</b> this day of February 2025.				
10					
11		John H. Chun United States District Judge			
12		omica states District stage			
	Presented by:				
13	NICHOLAS W. BROWN	GOLDFARB & HUCK ROTH			
14	Washington Attorney General	RIOJAS, PLLC			
15					
16	/s/ Jessica L. Creighton	/s/ Darwin P. Roberts			
17	Jessica L. Creighton, WSBA #37956 Assistant Attorney General	Darwin P. Roberts, WSBA #32539			
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22	E-mail: jessica.creighton@atg.wa.gov	ANGELI & CALFO LLC			
23	Attorneys for Defendants University of Washington and Perry Tapper	/s/ Peter D. Hawkes			
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STIPULATION AND [PROPOSED] ORDER TO POSTPONE CERTAIN DISCOVERY DATES & SET DEADLINES FOR BRIEFING - 3

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Attorneys for Intervenor-Defendants People for the Ethical Treatment of Animals, Inc. and Northwest Animal Rights Network

STIPULATION AND [PROPOSED] ORDER TO POSTPONE CERTAIN DISCOVERY DATES & SET DEADLINES FOR BRIEFING - 4